

EXHIBIT C

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7 Attorneys for Defendants
JOHNSON & JOHNSON (incorrectly named as
8 “Johnson & Johnson, Inc.”); JOHNSON & JOHNSON
CONSUMER INC., f/k/a and Successor-in-Interest to
9 NEUTROGENA CORPORATION (incorrectly named
as “NEUTROGENA”)
10

11 **UNITED STATES DISTRICT COURT**

12 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO/OAKLAND DIVISION**
13

14 JESSICA MARCH,

15 Plaintiff,

16 v.

17 JOHNSON & JOHNSON, INC., a New
18 Jersey Corporation; NEUTROGENA; and
DOES 1 through 100, Inclusive,

19 Defendants.
20

Case No. 3:21-cv-4044

**DECLARATION OF NOUSHAN
NOUREDDINI IN SUPPORT OF NOTICE
OF REMOVAL OF ACTION UNDER 28
U.S.C. SECTIONS 1332, 1441(b), AND 1446
(DIVERSITY)**

Complaint Filed: April 23, 2021

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1 I, Noushan Nouredдини, declare as follows:

2 1. I am an attorney duly admitted to practice law before this Court and all courts of the
3 State of California. I am an attorney at the law firm of Barnes & Thornburg LLP, counsel of record
4 for Defendants Johnson & Johnson (incorrectly named as “Johnson & Johnson, Inc.”) and Johnson
5 & Johnson Consumer Inc., f/k/a and Successor-in-Interest to Neutrogena Corporation (incorrectly
6 named as “Neutrogena”) (hereinafter collectively “Removing Defendants”). I make this
7 declaration in support of Removing Defendants’ Notice of Removal. I have personal knowledge
8 of the facts set forth herein, and if called as a witness, I could and would testify competently to the
9 facts contained herein.

10 2. On or about May 24, 2021, I ran comprehensive public background checks on a
11 person by the name of Jessica March. Attached hereto as **Exhibit 1** is a true and correct copy of
12 relevant and redacted excerpts from the Westlaw PeopleMap Report generated on May 24, 2021
13 on a person by the name of Jessica March, date of birth 12/XX/1972. Based on information and
14 belief, Plaintiff Jessica March is the person referred to in this report, which establishes that Plaintiff
15 has continuously resided in the State of California since at least 1995. Based on information and
16 belief and according to Exhibit 1 attached hereto:


- 17 a. Plaintiff currently resides in Brentwood, California in the County of Contra
18 Costa. She has resided at the same address since 2014.
- 19 b. The only reported residences for Plaintiff are in the State of California.
20 There are 17 California addresses associated with Plaintiff from 1995 to May
21 24, 2021.
- 22 c. Since December of 2012 through the present, Plaintiff has had utilities in
23 Pleasanton and Brentwood, California.
- 24 d. The only full phone numbers associated with Plaintiff have California area
25 codes. Plaintiff is associated with the area code of 925, which serves the
26 East Bay counties of Contra Costa and Alameda.
- 27 e. Plaintiff’s Social Security Number was first issued in California in 1988.

28 There is no reference to the State of New Jersey anywhere in Exhibit 1.

1 3. Attached hereto as **Exhibit 2** is a true and correct copy of the docket of a summary
2 of a dissolution of marriage action entitled *Jessica March v. Steven March*, filed on May 11, 2011
3 in the Superior Court of the State of California, County of Contra Costa.

4 I declare under penalty of perjury under the laws of the State of California and the United
5 States that the foregoing is true and correct.

6 Executed this 27th day of May, 2021 in Los Angeles, California.

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8 Noushan Nouredдини
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EXHIBIT 1



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Possible People Information

Person Overview

<p>JESSICA A MARCH</p> <p>744 SUMMERWOOD DR BRENTWOOD, CA 94513-1869 CONTRA COSTA County</p> <p>Phone Number(s):</p> <p>925- [REDACTED] 925- [REDACTED] 925- [REDACTED]</p> <p>SSN:</p> <p>[REDACTED]-XXXX - issued in CA in 1988</p> <p>DOB:</p> <p>12/XX/1972 (Age: 48)</p> <p>Spouse/Close Association:</p> <p>STEVEN</p>	
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Date of Birth Summary

Date of Birth	Source
12/XX/1972 (Age: 48)	Bank Account Header Records Experian Credit Header Experian Credit Header Real Time
09/XX/1974 (Age: 46)	People Find People Historical

SSN Summary

SSN	Source
[REDACTED]-XXXX - issued in CA in 1988	Bank Account Header Records Docket Equifax Credit Header Experian Credit Header Experian Credit Header Real Time People Find #1 People Find #2 People Historical Utility #1 Utility #2 Utility #3 Utility #4
[REDACTED]-XXXX - issued in CA in 1988	Experian Credit Header Experian Credit Header Real Time

Name Variations

Name	Source
JESSICA MARSH	Experian Credit Header Experian Credit Header Real Time
JESSICA M LIVESTOCK	Experian Credit Header Experian Credit Header Real Time
JESSICA MARCH	Experian Credit Header Experian Credit Header Real Time Liens and Judgments #1 Liens and Judgments #2 Liens and Judgments #3 Liens and Judgments #4 People Find #1 People Find #2 People Household Utility #1 Utility #2 Utility #3
JESSICA A SMYER	Experian Credit Header Real Time People Find #1 People Find #2 People Historical #1 People Historical #2
JESSICA SMYER	Experian Credit Header Real Time People Find #1 People Find #2
JESSICA ANN RAY	Experian Credit Header Real Time People Find #1 People Find #2 People Historical
JESSICA A RAY	Equifax Credit Header
JESSICA ANN MARCH	Bank Account Header Records #1 Criminal&Infraction #2 Criminal&Infraction #3 Criminal&Infraction #4 Equifax Credit Header Experian Credit Header Real Time
JESSICA ANNE MARCH	Arrest
JESSICA A MARCH	Docket Experian Credit Header Real Time
JESSICA MARIAH MARSH	Criminal&Infraction #1 Criminal&Infraction #2
JESSIA MARCH	Experian Credit Header Real Time
JESSICA SMYFER	Experian Credit Header Real Time

Addresses

Address
744 SUMMERWOOD DR, BRENTWOOD, CA 94513-1869 CONTRA COSTA County <i>Reported 03/14/2014 - 04/21/2021</i>
By Experian Credit Header Real Time 07/26/2014 - 04/21/2021
By People Find 04/30/2020 - 04/30/2020
By People Household 01/01/2018 - 01/31/2020
By Experian Credit Header 07/26/2014 - 10/14/2018
By Bank Account Header Records 08/09/2016 - 08/09/2016
By Equifax Credit Header 08/01/2015 - 08/31/2015
By Utility #1 03/14/2014 - 08/30/2015 Utility #2 Utility #3
2930 ROSSMORE LN, SAN JOSE, CA 95148-3525 SANTA CLARA County

<i>Reported 03/09/2020 - 03/09/2020</i>		
By Experian Credit Header 03/09/2020 - 03/09/2020	Experian Credit Header	
PO BOX 22, BYRON, CA 94514-0022 CONTRA COSTA County		
<i>Reported 08/08/2002 - 11/01/2013</i>		
By Experian Credit Header 08/08/2002 - 11/01/2013	Experian Credit Header	
By People Find 07/01/2013 - 07/01/2013	People Find #1	People Find #2
By Utility 12/31/2012 - 12/31/2012	Utility	
By People Household 01/01/2003 - 12/31/2011	People Household	
By Equifax Credit Header 10/01/2002 - 10/31/2002	Equifax Credit Header	
20650 MARSH CREEK RD, BRENTWOOD, CA 94513-4815 CONTRA COSTA County		
<i>Reported 10/20/2003 - 10/01/2013</i>		
By Experian Credit Header 10/20/2003 - 10/01/2013	Experian Credit Header	
By Experian Credit Header Real Time 10/20/2003 - 10/01/2013	Experian Credit Header Real Time	
By Equifax Credit Header 09/01/2005 - 09/30/2005	Equifax Credit Header	
By Bank Account Header Records	Bank Account Header Records	
4544 HARPER CT, PLEASANTON, CA 94588-3814 ALAMEDA County		
<i>Reported 12/31/2012 - 12/31/2012</i>		
By Utility 12/31/2012 - 12/31/2012	Utility	
1790 GAMAY DR, OAKLEY, CA 94561-1938 CONTRA COSTA County		
<i>Reported 09/01/2001 - 09/09/2007</i>		
By Experian Credit Header 09/07/2001 - 09/09/2007	Experian Credit Header	
By Experian Credit Header Real Time 09/07/2001 - 09/09/2007	Experian Credit Header Real Time	
By People Find 09/15/2001 - 01/23/2003	People Find #1	People Find #2
By Equifax Credit Header 09/01/2001 - 09/30/2001	Equifax Credit Header	
MR 1790 GAMAY DR, OAKLEY, CA 94561 CONTRA COSTA County		
<i>Reported 06/23/2006 - 06/23/2006</i>		
By Experian Credit Header 06/23/2006 - 06/23/2006	Experian Credit Header	
1569 MACHADO CT, CONCORD, CA 94521-1935 CONTRA COSTA County		
<i>Reported 07/01/1999 - 06/29/2004</i>		
By Experian Credit Header 07/24/1999 - 06/29/2004	Experian Credit Header	
By Experian Credit Header Real Time 07/24/1999 - 06/29/2004	Experian Credit Header Real Time	
By People Find 07/01/1999 - 07/01/1999	People Find #1	People Find #2
1036 ALLISON AVE, SAINT HELENA, CA 94574-1306 NAPA County		
<i>Reported 12/21/1994 - 01/23/2003</i>		
By People Find 08/01/2000 - 01/23/2003	People Find #1	People Find #2
By Experian Credit Header 12/21/1994 - 09/30/1997	Experian Credit Header	

By Experian Credit Header Real Time 12/21/1994 - 09/30/1997	Experian Credit Header Real Time
By People Historical	People Historical
1334 VIDOVIK AVE, SAINT HELENA, CA 94574-2029 NAPA County	
<i>Reported 01/01/1995 - 01/23/2003</i>	
By People Find 07/19/2001 - 07/19/2001	People Find #1 People Find #2
By Experian Credit Header 09/05/1995 - 10/10/1999	Experian Credit Header
By Experian Credit Header Real Time 09/05/1995 - 10/10/1999	Experian Credit Header Real Time
By People Historical 01/01/1995 - 12/31/1995	People Historical #1 People Historical #2
143 ROSE LN, SAINT HELENA, CA 94574-9723 NAPA County	
<i>Reported 07/17/1995 - 01/23/2003</i>	
By People Find 11/13/2000 - 11/13/2000	People Find #1 People Find #2
By Experian Credit Header 07/17/1995 - 03/19/1997	Experian Credit Header
By Experian Credit Header Real Time 07/17/1995 - 03/19/1997	Experian Credit Header Real Time
By People Historical 01/01/1996 - 12/31/1996	People Historical
1815 PARK ST, SAINT HELENA, CA 94574-1027 NAPA County	
<i>Reported 08/27/1997 - 01/23/2003</i>	
By Experian Credit Header 08/27/1997 - 08/11/2001	Experian Credit Header
By Experian Credit Header Real Time 08/27/1997 - 08/11/2001	Experian Credit Header Real Time
By People Find 09/01/1997 - 09/01/1997	People Find #1 People Find #2
2485 CAMINO DIABLO, BYRON, CA 94514-0030 CONTRA COSTA County	
<i>Reported 07/03/2002 - 08/29/2002</i>	
By Experian Credit Header 07/03/2002 - 08/29/2002	Experian Credit Header
By Experian Credit Header Real Time 07/03/2002 - 08/29/2002	Experian Credit Header Real Time
2390 N MAIN ST, WALNUT CREEK, CA 94596-3546 CONTRA COSTA County	
<i>Reported 09/19/2001 - 09/19/2001</i>	
By Experian Credit Header 09/19/2001 - 09/19/2001	Experian Credit Header
By Experian Credit Header Real Time 09/19/2001 - 09/19/2001	Experian Credit Header Real Time
1569 MARCH CT, CONCORD, CA 94521 CONTRA COSTA County	
<i>Reported 10/16/2000 - 10/16/2000</i>	
By Experian Credit Header 10/16/2000 - 10/16/2000	Experian Credit Header
1334 VIDOVIK AVE, SAINT HELENA, CA 94574-2020 NAPA County	
<i>Reported 09/05/1995 - 10/10/1999</i>	
By Experian Credit Header Real Time 09/05/1995 - 10/10/1999	Experian Credit Header Real Time

PO BOX 3254, SAINT HELENA, CA 94574 | NAPA County

Reported 01/01/1995 - 12/31/1995

By People Historical 01/01/1995 - 12/31/1995

[People Historical](#)

Utility Records

Type of Utility	Address	Connection Date	Confidence Score	View Full Text
MISCELLANEOUS	744 SUMMERWOOD DR BRENTWOOD, CA 94513-1869	08/30/2015	99%	Full-Text
CONVENIENCE	744 SUMMERWOOD DR BRENTWOOD, CA 94513-1869	06/14/2014	99%	Full-Text
CONVENIENCE	744 SUMMERWOOD DR BRENTWOOD, CA 94513-1869	03/14/2014	99%	Full-Text
CONVENIENCE	4544 HARPER CT PLEASANTON, CA 94588-3814	12/31/2012	99%	Full-Text

Phone Numbers

Phone	Source
925- [REDACTED]	Bank Account Header Records Experian Credit Header Real Time Utility #1 Utility #2 Utility #3
925- [REDACTED]	Experian Credit Header Real Time
925- [REDACTED]	Experian Credit Header Real Time
925- [REDACTED]	Experian Credit Header Real Time
[REDACTED] - [REDACTED]	People Find #1 People Find #2

Bank Account Header Records

City	State	Last Activity Date	Confidence Score	View Full Text
BRENTWOOD	CA	20160809	99%	Full-Text

Possible Adverse Information

Risk Flags Analysis

List of Possible Risk Flags

Risk Flags Name	Yes/No
Associate or Relative with a Prison Address on Record	No
P.O. Box Listed as Address	Yes
SSN Format is Invalid	No
World-Check Listing	No
Arrest Record	Yes
Address 1st Reported <90 Days	No
Residential Address Used as a Business Address	No
Recorded as Deceased	No
Person Associated with Marijuana Related Business	No
SSN Matches Multiple Individuals	Yes
Associate or Relative with P.O. Box Listed as Address	Yes
Global Sanctions	No
OFAC Listing	No
Prison Address on Record	No
Multiple SSNs	No
Age Younger than SSN Issue Date	No
Bankruptcy	Yes
Criminal Record	Yes
SSN Is an ITIN	No
Telephone Number Inconsistent with Address	No
Associate or Relative With a Residential Address Used as a Business Address	Yes

Risk Flag Details

P.O. Box Listed as Address	
Address: PO BOX 22, BYRON, CA 94514-0022 CONTRA COSTA County	Source: Experian Credit Header People Find People Household Utility Equifax Credit Header
Address: PO BOX 3254, SAINT HELENA, CA 94574 NAPA County	Source: People Historical
Arrest Record	
Full-Text	

Debtor	Creditor	Amount	Confidence Score	View Full Text
MARCH, JESSICA	INTERNAL REVENUE SERVICE		97%	Full-Text
MARCH, JESSICA	INTERNAL REVENUE SERVICE		97%	Full-Text
MARCH, JESSICA A	SACHIKO SANCHEZ		99%	Full-Text
MARCH, JESSICA	INTERNAL REVENUE SERVICE		97%	Full-Text
MARCH, JESSICA	INTERNAL REVENUE SERVICE		97%	Full-Text

Bankruptcy Records

Court	Filing Date	Confidence Score	View Full Text
CA-NBKR	02/24/2005	99%	Full-Text

Dockets

Court	Filing Date	Confidence Score	View Full Text
Twelfth Judicial Circuit	11/26/2018	62%	Full-Text
SUPERIOR COURT	07/10/2001	62%	Full-Text
Twelfth Judicial Circuit	07/14/2000	62%	Full-Text

Full-Text Documents

All Full-Text Documents

Utility Records (4)

[To Summary](#)

Utility Record

Source Information

Information Current Through:	05/23/2021	Service Address:	744 SUMMERWOOD DR BRENTWOOD, CA 94513-1869
Database Last Updated:	05/23/2021		
Update Frequency:	DAILY		
Current Date:	05/24/2021		

Address Information



Source:	EQUIFAX
---------	---------

Individual Information

Name:	JESSICA A MARCH
SSN:	[REDACTED]-XXXX
Service Type:	MISCELLANEOUS
Connect Date:	08/30/2015
Reported Date:	08/30/2015

End of Document

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[To Summary](#)

Utility Record

Source Information

Information Current Through:	05/23/2021
Database Last Updated:	05/23/2021
Update Frequency:	DAILY
Current Date:	05/24/2021
Source:	EQUIFAX

Address Information

Service Address:	744 SUMMERWOOD DR BRENTWOOD, CA 94513-1869
Billing Address:	744 SUMMERWOOD DR BRENTWOOD, CA 94513-1869

Individual Information

Name:	JESSICA MARCH
SSN:	[REDACTED]-XXXX
Service Type:	CONVENIENCE
Connect Date:	06/14/2014
Reported Date:	06/14/2014
Contact Phone:	925-[REDACTED]

End of Document

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[To Summary](#)

Utility Record

Source Information

Address Information

Information Current Through:	05/23/2021	Service Address:	744 SUMMERWOOD DR BRENTWOOD, CA 94513-1869
Database Last Updated:	05/23/2021		
Update Frequency:	DAILY	Billing Address:	744 SUMMERWOOD DR BRENTWOOD, CA 94513-1869
Current Date:	05/24/2021		
Source:	EQUIFAX		

Individual Information

Name:	JESSICA MARCH
SSN:	XXXX-XXXX
Service Type:	CONVENIENCE
Connect Date:	03/14/2014
Reported Date:	03/14/2014
Contact Phone:	925-XXXX

End of Document

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[To Summary](#)

Utility Record

Source Information

Information Current Through:	05/23/2021
Database Last Updated:	05/23/2021
Update Frequency:	DAILY
Current Date:	05/24/2021
Source:	EQUIFAX

Address Information

Service Address:	4544 HARPER CT PLEASANTON, CA 94588-3814
Billing Address:	PO BOX 22 BYRON, CA 94514-0022

Individual Information

Name:	JESSICA MARCH
SSN:	XXXX-XXXX
Service Type:	CONVENIENCE
Connect Date:	12/31/2012
Reported Date:	12/31/2012
Contact Phone:	925-XXXX

End of Document

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Address Last Reported:	03/19/1997
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End of Document

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Equifax Credit Header Records (1)

[To Summary](#)

CREDIT HEADER

Source Information

Information Current Through:	02/24/2021
Database Last Updated:	03/01/2021
Update Frequency:	MONTHLY
Current Date:	05/24/2021
Source:	EQUIFAX CREDIT HEADER

Individual Information

Name:	MARCH, JESSICA ANN
Also Known As:	RAY, JESSICA A
SSN:	XXXX-XXXX
SSN Status	CONFIRMED
Birthday:	DECEMBER XX

Last Known Address Information

Current Address:	744 SUMMERWOOD DR BRENTWOOD, CA 94513
Address On File Since:	08/2015

Other Address Information

Previous Address:	PO BOX 22 BYRON, CA 94514
Address On File Since:	10/2002
Previous Address:	20650 MARSH CREEK RD BRENTWOOD, CA 94513
Address On File Since:	09/2005
Previous Address:	1790 GAMAY DR OAKLEY, CA 94561
Address On File Since:	09/2001

End of Document

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Bank Account Header Records (1)

[To Summary](#)

Bank Account Header Record

Source Information:

Information Current Through:	03/12/2020
Database Last Updated:	03/17/2021
Update Frequency:	MONTHLY
Current Date:	05/24/2021
Source:	BANK ACCOUNT HEADER RECORDS
Record Last Updated:	08/09/2016

Individual Information:

Name:	MARCH, JESSICA ANN
Last Reported:	08/09/2016

Social Security/Individual Taxpayer Identification Number:

Most Recent SSN/ITIN:	██████-XXXX
Last Reported:	08/09/2016

Date of Birth Information:

Date of Birth:	12/XX/1972
Last Reported:	08/09/2016

Driver's License Information:

Driver's License:	██████████
Issue State:	CA
Last Reported:	08/09/2016

Address Information:

Current Address:	744 SUMMERWOOD DR BRENTWOOD, CA 94513-1869
Last Reported:	08/09/2016
Previous Address:	20650 MARSH CREEK RD

No Documents Were Found In These Sources

Aircraft Records	BusFindCanada
BusFindUS	Business Profile
Conceal & Carry Weapons Permits	Corporate Records & Business Registrations
D&B Worldbase	Death Records
Divorce Records	DMI
Drivers Licenses	Email Address Records
Executive Affiliations	Executive Bios
FBN/DBA	FEIN
Global Sanctions	Healthcare Licenses
Healthcare Sanctions	Historical Address Records
Hunting & Fishing Licenses	International Business Profile
Lawsuit Records	Marijuana Related Businesses
Marriage Records	Motor Vehicle Service & Warranty Records
National Provider Identifier	New Movers Records
OFAC	People Canada Records
Phone Records	Political Donors
Professional Licenses	Real Property Pre-Foreclosure Records
Real Property Tax Assessor Records	Real Property Transactions
Real-Time Motor Vehicles	Stock
Transunion Phone Records	UCC Records
Unclaimed Assets	Vehicle Registrations
Voter Registrations	Watercraft Records
Work Affiliations	

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GLB - For use by a person holding a legal or beneficial interest relating to the consumer.

VOTERS - NO PERMISSIBLE USE.

Skip Tracing for Consumer Collections Declaration - Are you using this product for skip tracing related to consumer debt collection? - No

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EXHIBIT 2



Case MSD11-02197 - Complaints/Parties

Complaint Number: 1				
Complaint Type: Dissolution With Children				
Filing Date: 05/11/2011				
Complaint Status: DISMISSED 06/03/2011				
Party Number	Party Type	Party Name	Attorney	Party Status
1	PETITIONER	JESSICA ANN MARCH	Pro Per	DISMISSED 06/03/2011
2	RESPONDENT	STEVEN ANTHONY MARCH		DISMISSED 06/03/2011

Case MSD11-02197 - Actions

Viewed	Date	Action Text	Disposition	Image
	05/10/2012 7:00 AM DEPT. 12	CHECK FOR DISPO/JUDGMENT	VACATED	
	08/19/2011 7:00 AM DEPT. 12	CLERK TICKLER TO CHECK FOR PROOF OF SERVICE	VACATED	
	06/03/2011	FAMILY LAW CAD BEFORE HEARING - OTHER DISMISSAL	Not Applicable	
	05/26/2011 7:00 AM DEPT. 12	CHECK FOR PAYMENT OF \$395 1ST PAPER FEES BY PETITIONER	VACATED	
	05/11/2011	ORDER ON COURT FEE WAIVER AS TO JESSICA ANN MARCH IS DENIED	DENIED	
	05/11/2011	CLERK'S TICKLER WAS SET ON 5/26/11, AT 7:00 IN DEPARTMENT 12		
	05/11/2011	INCOME & EXPENSE DECLARATION FILED BY JESSICA ANN MARCH	Not Applicable	
	05/11/2011	CLERK'S TICKLER TO CHECK FOR PROOF OF SERVICE WAS SET FOR 8/19/11 AT 7:00 IN DEPT. 12		
	05/11/2011	CLERK'S TICKLER TO CHECK FOR DISPO/JUDGMENT WAS SET FOR 5/10/12 AT 7:00 IN DEPT. 12		
	05/11/2011	COPY OF ORDER DENYING FEE WAIVER TO PETITION VIA US MAIL - FEES DUE NLT 05-26-11	Not Applicable	

	05/11/2011	CASE ENTRY COMPLETE	Not Applicable	
	05/11/2011	COLOR OF FILE (FAMILY LAW): YELLOW	Not Applicable	
	05/11/2011	ZIP CODE OF INTIAL FILING PARTY IS: 94514	Not Applicable	
	05/11/2011	APPLICATION FOR WAIVER OF COURT FEES AND COSTS FILED BY JESSICA ANN MARCH		
	05/11/2011	(FAMILY LAW) SUMMONS ON DISSOLUTION WITH CHILDREN FILED 05/11/2011 OF JESSICA MARCH FILED	Not Applicable	
	05/11/2011	PETITION FOR DISSOLUTION FILED. SUMMONS IS ISSUED	Not Applicable	
	05/11/2011	CASE HAS BEEN ASSIGNED TO DEPT. 12		

Case MSD11-02197 - Pending Hearings

Date	Action Text	Disposition	Image
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[Back](#)
[Exit](#)